Susan Russell, OSB No. 89451 Assistant Federal Public Defender 101 SW Main Street, Suite 1700 Portland, OR 97204

Tel: (503) 326-2123 Fax: (503) 326-5524

Email: susan_russell@fd.org Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON PORTLAND DIVISION

UNITED STATES OF AMERICA, CR No. 11-385-HZ

Plaintiff, MOTION FOR WITHDRAWAL AND

SUBSTITUTION OF APPOINTED

COUNSEL

RASHAD Q. SANDERS,

vs.

Defendant.

The defendant, Rashad Q. Sanders, through counsel, Susan Russell, respectfully moves this Court for an order authorizing withdrawal of counsel and substitution of new appointed counsel, Mark Cross, 294 Warner Milne Road, Oregon City, OR, 97045, 503-655-0037, of the Criminal Justice Act Panel, on the basis that there has been an irreparable

disruption of the attorney/client relationship.

RESPECTFULLY SUBMITTED this December 20, 2011.

/s/ Susan Russell

Susan Russell Attorney for Defendant